

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

*Jessica DeRubbio et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)*

**THE DeRUBBIO PLAINTIFFS' NOTICE OF MOTION FOR  
PARTIAL FINAL JUDGMENT II**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., (“Goldman Declaration”), along with the exhibits appended, certain plaintiffs in the above-referenced matter who are identified on Exhibit A to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order awarding them: (1) judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett*, *Havlish*, *Ashton*, *Bauer*, and other cases; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages; and (3) permission for such plaintiffs to seek punitive damages, economic damages, and other appropriate damages at a later date.

Plaintiffs request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on May 28, 2019. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF No. 4563.

Respectfully submitted,

/s/ Jerry S. Goldman

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